

Exhibit A

WILLIAM PFISTER, JR., ESQ., LLC  
830 Broad Street, Suite 4  
Shrewsbury, New Jersey 07702  
(732) 268-8928  
Attorney for Plaintiffs  
Our File 6213P

ELIZABETH COHEN	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION MONMOUTH COUNTY
	:	
Plaintiff(s)	:	DOCKET NO. _____
	:	
Vs.	:	Civil Action
	:	
	:	COMPLAINT
STARBUCKS CORPORATION, JOHN DOE(S) I-X	:	
	:	
Defendant(s)	:	

Plaintiff, Elizabeth Cohen, residing at 1 Scenic Drive, Unit PH10, Highlands,  
New Jersey, 07732, Monmouth County, by way of Complaint against the Defendant says:

**FIRST COUNT**

1. Starbucks Corporation (Starbucks) is a business entity doing business in Monmouth County, New Jersey and elsewhere.
2. John Doe defendants 1-10 are business entities that negligently and/or defectively designed, created, approved, controlled, built, maintained and/or inspected a dangerous condition at the location of the plaintiff's fall.
3. On January 18, 2017 plaintiff was on vacation with her husband in Mexico.
4. On January 18, 2017 plaintiff and her husband were patrons of a Starbucks, located in San Jose del Cabo, Baja California, Mexico when plaintiff was caused to fall due to a dangerous condition existing at that time and place.

5. The dangerous condition was negligently and defectively designed, created, approved, controlled, built, maintained and/or owned by defendant Starbucks and/or John Does 1-10.

6. The dangerous condition existing at that time and place was the cause of the plaintiff's fall.

7. Plaintiff was damaged by the negligence of defendant Starbucks and/or John Does 1-10. , suffering severe and permanent personal injuries, requiring significant medical treatment including two surgeries, pain and suffering, loss of life's enjoyment, expended sums of money for medical treatment and was otherwise damaged.

WHEREFORE, Plaintiff demands judgment against Defendant for damages, attorney's fees, cost of suit, interest and such others as the Court deems just and equitable.

**JURY DEMAND**

This Plaintiff hereby demands a trial by jury as to all issues.

Dated:

11/27/18

By

William Pfister, Jr.  
William Pfister, Jr., Esq.

**CERTIFICATION OF NO OTHER ACTION PENDING**

I certify that pursuant to R. 4:5-1(b)(2) that the matter in controversy is not the subject of any other action or arbitration proceeding, nor are any contemplated, and that

to the best of my knowledge and information, no other parties should be joined in this action.

Dated:

By William Pfister, Jr.  
William Pfister, Jr., Esq.  
Attorney Id. No. 018811987

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the provisions of Rule 4:25-4, the Court is advised that William Pfister, Jr., Esq., is hereby designated as trial counsel.

Dated:

11/27/18

By William Pfister, Jr.  
William Pfister, Jr., Esq.

Our File No.: 6213P

**PROOF OF FILING**

The undersigned hereby certifies as follows:

1. I am employed by the Law Offices of William Pfister, Jr., Esq.
2. On or about November 27, 2018 the undersigned caused to be e-filed a copy of the within Complaint to the following parties:

Clerk  
Superior Court of New Jersey  
Law Division, Monmouth County  
71 Monument Park  
Freehold, NJ 07728

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing are willfully false, I am subject to punishment.

Posting this Complaint on eCourts shall function as service of the Complaint.

  
\_\_\_\_\_  
Sara Cohen

## Civil Case Information Statement

### Case Details: MONMOUTH | Civil Part Docket# L-004226-18

**Case Caption:** COHEN ELIZABETH VS STARBUCKS  
CORPORATIO N

**Case Initiation Date:** 11/27/2018

**Attorney Name:** WILLIAM, J PFISTER

**Firm Name:** WILLIAM PFISTER, JR. ESQ. LLC

**Address:** 830 BROAD ST SUITE 4

SHREWSBURY NJ 07702

**Phone:**

**Name of Party:** PLAINTIFF : Cohen, Elizabeth

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** PERSONAL INJURY

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Hurricane Sandy related?** NO

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/27/2018  
Dated

/s/ WILLIAM, J PFISTER  
Signed